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7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON**
9 **TACOMA DIVISION**

10 WILL CO. LTD. a limited liability company
11 organized under the laws of Japan,

12 Plaintiff,

13 vs.

14 KA YEUNG LEE, an individual; YOUHAHA
15 MARKETING AND PROMOTION
16 LIMITED, a foreign company; and, DOES 1-
17 20, d/b/a THISAV.COM,

18 Defendants

Case No. 3:20-cv-05802-BHS

**DECLARATION OF FRANK
SCARDINO IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS**

19 **DECLARATION OF FRANK SCARDINO IN SUPPORT OF DEFENDANTS'**
20 **MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

21 I, Frank Scardino, declare and state as follows:

22 1. My name is Frank Scardino. I am over the age of 18 years. I am an associate
23 attorney at Boston Law Group, PC, which is counsel to the Defendants with pending *pro hac vice*
24 applications in the above captioned case. I am licensed to practice law in the Commonwealth of
Massachusetts, and my bar number is 703911 in Massachusetts. I make this declaration based
upon personal knowledge. All statements contained in this declaration are true and correct to the

1 best of my knowledge. If called as a witness, I could and would testify as to the facts set forth in
2 this declaration.

3 2. On March 11, 2021, I visited a section of Cloudflare.com's website. The specific
4 URL I visited was: <https://www.cloudflare.com/about-overview/>. A true and correct screenshot of
5 a portion of this page is attached hereto as Exhibit A. This portion of Cloudflare's website reads,
6 in part, "Anytime we push code, it automatically affects approximately 25 million Internet
7 properties" and "We serve data from 200 cities in over 100 countries around the world."

8 3. On March 11, 2021, I visited a section of Cloudflare.com's website. The specific
9 URL I visited was: <https://www.cloudflare.com/network/>. A true and correct PDF copy of this
10 page is attached hereto as Exhibit B. This portion of Cloudflare's website list the cities in which
11 Cloudflare operates a network site (*i.e.* a server). According to this page, Cloudflare has servers in
12 the following Asian cities (without limitation) Tokyo, Hong Kong, Osaka, Taipei, Shanghai, and
13 Guangzhou.

14
15 I declare under penalty of perjury that the foregoing facts are true and correct.

16 Executed on March 11, 2021

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18 /s/ Frank Scardino
19 Frank Scardino
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